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Presentment Date: March 10, 2011 at 10:00 a.m.

Objection Deadline: March 7, 2011 at 10:00 a.m.

*Attorneys for Irving H. Picard, Esq.,
Trustee for the Substantively
Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities
LLC and Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF TRUSTEE'S MOTION FOR AN ORDER
ESTABLISHING PROCEDURES FOR AN ELECTRONIC DATA ROOM**

PLEASE TAKE NOTICE that upon the annexed motion (the "Motion"), Irving H.
Picard, Esq. (the "Trustee"), trustee for the substantively consolidated liquidation proceeding of

Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa et seq., and the estate of Bernard L. Madoff (“Madoff,” and together with BLMIS, each a “Debtor” and collectively, the “Debtors”), the undersigned will present the attached proposed order (the “Order”) to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature and entry on **March 10, 2011 at 10:00 a.m.**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must: (i) be made in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York and other applicable rules and guidelines; (iii) be filed, in accordance with General Order M-399, electronically with the Bankruptcy Court, with a hard copy marked “Chambers Copy” delivered, pursuant to Local Rule 9070-1, to the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004, and served upon the following: (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., Judith A. Selby, Esq., and Marc Hirschfield, Esq.; and (b) Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, D.C. 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than **March 7, 2011** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Motion with proof of service is filed with the Court by the Objection Deadline, the relief requested shall be deemed unopposed, there will not be a hearing and the Bankruptcy Court may enter an order granting the relief sought.

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is timely filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge,

at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, New York
February 24, 2011

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan

David J. Sheehan

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Liquidation of Bernard L. Madoff Investment
Securities LLC and Bernard L. Madoff*